

**EX PARTE**

November 11, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
TW-A325  
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service: CC Docket No. 96-45

Dear Ms. Dortch:

On November 10, 2005, Daniel Alvarez and I, representing j2 Global Communications, Inc. ("j2 Global"), met with Thomas Navin, Chief of the Wireline Competition Bureau, and members of his staff. We discussed the Commission's proposal to modify the current universal service mechanism by using telephone numbers as the device triggering contribution obligations.

We noted that j2 Global uses over ten million telephone numbers in providing outsourced, value-added messaging service, including service that converts facsimile transmissions to email and voice transmissions to voice mail. Of these telephone numbers, some 9.5 million are used to provide "free" service to customers. In the event that all telephone numbers, regardless of the uses which they facilitate, trigger universal service contribution obligations, j2 Global would discontinue its "free" services as uneconomic. This would result in loss of service to these millions of customers who value j2 Global "free" services without any corresponding benefit to the universal service fund.

We suggested that in the event telephone numbers were used in whole or in part as the contribution trigger, it would be appropriate to exempt uses of the type exemplified by j2 Global's services. Among the possible bases for exemption are:

- Numbers used in the provision of information services that by virtue of systems architecture cannot be used for real time communication.
- Numbers employed in connection with services that are provided at nominal or no cost to subscribers.
- Numbers used exclusively to provide facsimile and non- real time services.

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Pursuant to section 1.1206(b)(2) of the Commission's rules, the letter is being filed electronically in the record of the above-referenced proceeding. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/ Philip L. Verveer

Philip L. Verveer

cc: Cathy Carpino  
Narda Jones  
Jeremy Marcus